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| --- | --- | --- |
| Division | Purpose | Check list |
| Legal Requirements | Implementation of customer verification for virtual asset providers (Act §5-2③) and inspection of real-name verification deposit and withdrawal account opening requirements (Enforcement §10-18) | ISMS certified? |
| History of violations of the Financial Management Act |
| Classification/management of deposits/property and transaction details by customer |
| Whether Dark Coins are handled |
| Is the FIU report valid? |
| Other Requirements | Inspection of matters that may seriously damage business continuity due to illegal acts of virtual asset business operators, external hacking, etc. | Bankruptcy, rehabilitation, business suspension history |
| History of embezzlement/fraud involvement of representatives and employees |
| External hacking history |
| Credit rating |
| Whether the net loss continues |

Table) Example of essential requirements check items

|  |  |  |
| --- | --- | --- |
| Risk Classification | Evaluation Index | |
| Evaluation Indicator Name | Evaluation Indicator Description |
| National risk | Virtual asset trading volume by country | The more virtual asset transactions of high-risk national customers, the higher the risk |
| Goods and Services Risk | Virtual asset credit rating | The risk increases as virtual assets with low credit rating are handled (eg, using the virtual asset credit rating information of the Jangle site ) |
| Goods and Services Risk | Number of virtual assets handled | The more tradable virtual assets, the higher the risk. |
| Goods and Services Risk | High-risk coin trading volume | The higher the number of transactions of a low-credit coin, the higher the risk. |
| Customer Risk | Number of customers by country | The more high-risk nationalities there are, the higher the risk. |
| Customer Risk | Number of high-risk customers | The more customers in a high-risk industry, the higher the risk |
| Business Risk | Equity ratio | The lower the equity ratio, the lower the company's financial soundness and the higher the risk. |

Table) Examples of intrinsic risk assessment items

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| --- | --- | --- | --- | --- |
| Classification of evaluation items | | | Evaluation  item name | Evaluation item description |
| Level1 | Level2 | Level3 |
| AML Internal Controls | Management system | Regulation management | Whether regulations/guidelines are managed | Whether it is managed in accordance with anti-money laundering laws and regulations and whether management approves revisions to anti-money laundering regulations |
| Company-wide risk management | Conduct company-wide risk assessment | Whether a company-wide risk assessment is performed | Whether AML-related company-wide risk assessment is performed and whether improvement plans are prepared |
| Organizational expertise | Independence of reporting officer | Independence of the reporting officer | Whether to form a meeting group for AML-related discussions and whether to report to management on major issues  - Meeting group: AML-related consultative body supervised by management or delegated decision-making authority |
| Organizational expertise | Independence of reporting officer | Title of Reporting Officer | Whether the person in charge of reporting has been appointed to a certain rank or higher to smoothly perform anti-money laundering related tasks |
| Organizational expertise | Independence of reporting officer | Reporter's experience | Whether the reporting officer has sufficient experience in anti-money laundering related business |
| Training & Education Management | Manual | Training Manual Management | Whether AML education-related procedures are reflected in the manual |
| Training & Education Management | Training | Training for employees | Whether training is regularly conducted for all employees at least once a year |
| Know our employee system | Know our employee system | Know our employee system | Whether identification/verification and watch-list filtering are implemented for existing employees |

Table) Examples of control risk assessment items